

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED LAFAYETTE

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WESTERN DISTRICT OF LOUISIANA
LAFAYETTE, LOUISIANA

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA

V.

RAYMOND F. DOYLE, III

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CRIMINAL NO. 12-CR-00173

18 U.S.C. § 2251(a)

18 U.S.C. § 2422(b)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2252A(a)(2)(A)

JUDGE HAIK

MAGISTRATE JUDGE HANNA

SUPERCEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

PRODUCTION OF CHILD PORNOGRAPHY

18 U.S.C. § 2251(a)

Beginning on an unknown date but reasonably near to the 29th day of August, 2011 and continuing until on or about the 25th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor Z.T. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 2

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 29th day of August, 2011 and continuing until on or about the 25th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor Z.T. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 3

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 1st day of November, 2010 and continuing until on or about the 19th day of November, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor A.L. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 4

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 1st day of November, 2010 and continuing until on or about the 19th day of November, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor A.L. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 5

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 18th day of March, 2012 and continuing until on or about the 21st day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor S.M. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 6

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 18th day of March, 2012 and continuing until on or about the 21st day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor S.M. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 7

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 17th day of March, 2012 and continuing until on or about the 18th day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor T.F. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 8

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 17th day of March, 2012 and continuing until on or about the 18th day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor T.F. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 9

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 3rd day of March, 2012 and continuing until on or about the 22nd day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor J.M. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 10

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 3rd day of March, 2012 and continuing until on or about the 22nd day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor J.M. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 11

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 17th day of September, 2011 and continuing until on or about the 24th day of September, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor A.S. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 12

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 17th day of September, 2011 and continuing until on or about the 24th day of September, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor A.S. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 13

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 17th day of September, 2011 and continuing until on or about the 24th day of September, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor J.S. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 14

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 17th day of September, 2011 and continuing until on or about the 24th day of September, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor J.S. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 15

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 14th day of April, 2012 and continuing until on or about the 15th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor B.W. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 16

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 14th day of April, 2012 and continuing until on or about the 15th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor B.W. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 17

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 22nd day of March, 2012 and continuing until on or about the 20th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor T.S. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 18

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 22nd day of March, 2012 and continuing until on or about the 20th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor T.S. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 19

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 26th day of March, 2012 and continuing until on or about the 30th day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor Z.B. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 20

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 26th day of March, 2012 and continuing until on or about the 30th day of March, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor Z.B. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 21

**PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. § 2251(a)**

Beginning on an unknown date but reasonably near to the 4th day of September, 2011 and continuing until on or about the 19th day of November, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did persuade, induce, entice, coerce and use a minor E.M. to engage in sexually explicit conduct, and attempt to do so, as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of said conduct, knowing that the visual depictions would be transmitted using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2251(a). [18 U.S.C. § 2251(a)].

COUNT 22

**USING A FACILITY IN INTERSTATE COMMERCE TO
ATTEMPT TO COERCE A MINOR TO ENGAGE IN CRIMINAL SEXUAL ACTS
18 U.S.C. § 2422(b)**

Beginning on an unknown date but reasonably near to the 4th day of September, 2011 and continuing until on or about the 19th day of November, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, using a facility of interstate commerce, did knowingly and intentionally persuade, induce, entice and coerce a minor E.M. to engage in sexual activity for which a person could be charged with a criminal offense and attempt to do so, all in violation of Title 18, United States Code, Section 2422(b). [18 U.S.C. § 2422(b)].

COUNT 23

POSSESSION OF CHILD PORNOGRAPHY

18 U.S.C. § 2252A(a)(5)(B)

On or about the 25th day of April, 2012, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did knowingly and intentionally possess a computer containing child pornography images and movies as defined in Title 18, United States Code, Section 2256, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B). [18 U.S.C. § 2252A(a)(5)(B)].

COUNT 24

**RECEIVING CHILD PORNOGRAPHY
18 U.S.C. 2252A(a)(2)(A)**

On or about the 7th day of December, 2011, in the Western District of Louisiana, the defendant, RAYMOND F. DOYLE, III, did knowingly and intentionally receive in interstate commerce, child pornography as defined in Title 18, United States Code, Section 2256, all in violation of Title 18, United States Code, Section 2252A(a)(2)(A). [18 U.S.C. § 2252A(a)(2)(A)].

A TRUE BILL

REDACTED

JD JURY

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